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BUREAU OF LAND MANAGEMENT
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In Reply Refer To:
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To: All Employees

From: State Director

Subject: FY 2003 Program Element Coding Guidance

We need your help! This is a critical year for Colorado, and we must make every effort to ensure that Colorado's data in the BLM's Management Information System is as accurate as possible. Accurate data will serve the State in three crucial ways: by providing better documentation to support our budget requests, by enabling us to comply with more rigorous audits, and by improving our accuracy when developing workforce planning strategies.

Data integrity is vital to the success of BLM-Colorado, and accurate coding of time and attendance is vital to data integrity. Please review this guidance carefully. All employees must coordinate with their supervisors to ensure proper coding of time and work, and all supervisors must audit coding practices on a quarterly basis to ensure that this guidance is followed. A simple auditing procedure is outlined at the end of this memo.

General Guidance

All offices are responsible for coding time and work accurately. Employees should code their time to program elements and subactivities that best represent the work that has been done. Managers must ensure that employees do not continue to perform work if appropriate subactivity funding is unavailable. It is not appropriate to code work and time to external subactivities where funds are more readily available. When "benefiting subactivity" funds are nearly expended, management needs to decide whether work will cease or funds will be reprogrammed. Reprogramming requests should be pursued through the State Budget Officer and the Associate State Director.

BLM's benefiting subactivity concept remains a key component of BLM's budget structure, however, appears as though it is inconsistently interpreted and thus inconsistently applied from office to office. Use of the benefiting subactivity concept means that work, time and expenditures are coded to the subactivity that drives the BLM to do the work. For example, the benefiting subactivity for it processing an oil and gas "Application for Permit to Drill" (APD) is oil and gas. The oil and gas subactivity should provide all the funds to process these applications including the cost of compliance with the National Historic Cultural Resource Program, the Endangered Species Act, NEPA, etc. In practice, the Cultural Resource Program, the Endangered Species Program, and the wildlife program, to name a few, have consistently been charged to support the processing of APDs. This is not appropriate cost coding.

It is important to understand that the benefiting subactivity concept does provide the BLM with a reasonable amount of flexibility. Many work efforts benefit multiple programs, while other work efforts accomplish a subactivity-specific objective. For example, a riparian area improvement project could be developed to specifically benefit fish, wildlife, livestock, water quality and endangered species. In such instances, there is significant flexibility regarding program element and subactivity coding options. Conversely, a wild horse and burro gather that is completed for the primary purpose of protecting or enhancing a specific stream or riparian area that is being degraded by a herd could reasonably be coded to the riparian management subactivity.

Supervisors should make final determinations regarding cost coding practices of employees within their charge. These determinations should be made based upon the defensibility of coding practices in the event of an IG or GAO audit.

Further Clarification Regarding A, P and X Coding Practices for FY 2003

- “A” codes will be measured as units of accomplishment. As a result, most “A” codes have “number of contacts” as the new measure. For clarification, refer to the appropriate code through the program element links at <http://web.wo.blm.gov/abc/>.
- “P” codes should only be used where “direct” codes fail to sufficiently describe work accomplished. **In general, “P” codes should be avoided**, except for instances where “support work” can’t be reasonably tied to specific outputs via “direct” codes.
- “X” codes should be restricted to work that is overarching in scope. As such, they should not be used if outputs could be attributed to other program elements. **Remember, all employees should code their work to the subactivities and program elements that best represent the outputs that result from the work they do.** Refer to the program element links at <http://web.wo.blm.gov/abc/> for additional guidance that is specific to each program element.

Auditing Requirements for FY 2003

Supervisors should use the “Labor Coding” report at <http://web.co.blm.gov/misreports/index.htm> to audit coding practices within their offices. The first audit should be conducted at the end of the first quarter, at which time program element and subactivity coding practices should be reviewed by the following measures: **amount of use**, and **appropriateness of use**. All discrepancies should be corrected immediately upon discovery.

Questions?

Direct program-specific questions to your supervisor.

Direct technical questions to Jeff Davis at: (303) 239-3824.

Signed by
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Acting State Director

Authenticated by
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